

QUINN • COVARRUBIAS

Stephanie L. Quinn (Nevada Bar No. 12632)
 Mariel Covarrubias *pro hac vice*
 Pearl M. Walker *pro hac vice*
QUINN • COVARRUBIAS
 2220 Douglas Blvd., Suite 240
 Roseville, CA 95661
 T: (916) 400-2300
 F: (916) 400-2311
 Email: squinn@quinncova.com
marielc@quinncova.com
pwalker@quinncova.com

Renee Finch, Esq. (Nevada Bar No. 13118)
MESSNER REEVES, LLP
 9845 West Russell Road, Suite 300
 Las Vegas, NV 89148
 T: (702) 363-5100
 F: (702) 363-5101
 Email: rfinch@messner.com

Attorneys for Defendants,
 JASON HICKMAN;
 HOLMAN FLEET LEASING, LLC/ARI FLEET LT; and
 UNION PACIFIC RAILROAD COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THERESA COHEE, individually
 Plaintiff,

vs.

HOLMAN FLEET LEASING, LLC, a Foreign
 Limited-Liability Company; ARI FLEET LT, a
 business trust, a Foreign Business Trust; UNION
 PACIFIC RAILROAD COMPANY, a Foreign
 Corporation; JASON M. HICKMAN,
 individually; DOES I through X; and ROE
 CORPORATIONS I through X, inclusive
 Defendants.

Case No.: 2:23-cv-01747-JCM-BNW

**STIPULATION AND (PROPOSED) ORDER
 TO AMEND SCHEDULING ORDER
 (FIFTH REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate to request that this Court enter an order extending the deadlines in the current Scheduling Order [Doc 16].

1 The parties bring this stipulation and request for an order extending pretrial
2 deadlines to allow the parties to complete additional discovery necessary for expert
3 discovery, fact discovery and trial preparation. This is the parties' fourth request for an
4 extension of deadlines. There is no trial date set in this matter.

5 Good cause exists to extend the pretrial deadlines. The parties have worked
6 diligently to complete discovery.

7 **DISCOVERY COMPLETED TO DATE- LR 26-3(a)**

8 1. Plaintiff served her Initial FRCP 26(a) Disclosures and Supplements
9 thereto.

10 2. Defendants served their Initial FRCP 26(a) Disclosures and supplements
11 thereto.

12 3. Defendants served Interrogatories and Requests for Production of
13 Documents on Plaintiff on February 14, 2024.

14 4. Plaintiff served Interrogatories and Requests for Production of Documents
15 on Defendant on February 7, 2024.

16 5. Defendants served their responses to Plaintiff's discovery on April 5, 2024.

17 6. Plaintiff served her responses to Defendants' discovery requests on May 8,
18 2024.

19 7. Defendant Hickman served a second set of Requests for Production of
20 Documents on Plaintiff on May 21, 2024, which Plaintiff answered on June 20, 2024.

21 8. Defendant Union Pacific served a second set of Requests for Production on
22 Plaintiff on May 30, 2024, which Plaintiff responded to on June 26, 2024.

23 9. Plaintiff served supplemental responses to her responses to Defendant
24 Union Pacific's Interrogatories on July 2, 2024.

25 10. Defendants have served several subpoenas on Plaintiff's medical providers.

26 11. Plaintiff's deposition took place on August 12, 2024.

27 12. A Car Inspection of Plaintiff's vehicle took place on August 12, 2024.

28 13. Defendant Jason Hickman's deposition took place on August 13, 2024.

14. A Rule 35 Examination took place on September 17, 2024, of Plaintiff.
15. Dr. Steven C. Thomas' deposition took place on October 2, 2024.
16. Deposition of Dr. Eric Biesbroeck took place on October 23, 2024.
17. Deposition of Dr. Amir Paydar took place on November 27, 2024.
18. Deposition of Robert Ostolaza took place on December 9, 2024.
19. Disclosure of Initial Expert Witnesses took place on January 17, 2025.
20. Defendant UP Served Second Set of Interrogatories, Third Set of Requests for Production of Documents and First Set of Requests for Admissions on March 28, 2025;
21. Defendant UP Served Second Set of Requests for Admissions on April 2, 2025;
22. Plaintiff responded to all of Defendants' Discovery Requests on April 29, 2025;
23. Deposition of Defendant 30(b)(6) witness took place on May 1, 2025.

DISCOVERY REMAINING – LR 26-3(b)

1. Depositions of Liability and Medical Experts.
2. Additional fact witnesses depositions – Plaintiff's family members.
3. Deposition of Dr. Daniel Libke noticed to take place on October 1, 2024, pending rescheduling due to unavailability.
4. Additional Depositions of treating physicians pending scheduling.

GOOD CAUSE FOR EXTENSION – LR 26-3(c)

Pursuant to LR IA 6-1 and LR 26-3, the parties represent that good cause exists for the extension of the deadline for discovery deadlines, and the deadlines for dispositive motions and the joint pre-trial order. Plaintiff underwent a heart procedure in March 2024 and had complications from that surgery. As a result of the complications, Plaintiff was hospitalized on multiple occasions. This greatly hindered the parties' ability to conduct discovery necessitating extensions for Plaintiff to verify discovery responses and delaying her ability to be deposed. Additionally, Plaintiff

had to stop all her treatment that she was receiving in this instant matter to focus on her heart condition. However, Plaintiff's cardiologist has recently released her from cardiology care and she is able to move forward with her treatment for this instant matter. As such, Plaintiff resumed her treatment with Dr. Kaplan for her neck injury and is currently scheduled for neck surgery with Dr. Kaplan for May 20, 2025. It is expected she will need 4-6 weeks after the surgery to fully recover with doing physical therapy and follow-up visits with Dr. Kaplan. Additionally, Defendants are currently engaged in a two-to-three-week Trial in the County of Los Angeles, California, Case No. 21STCV09377.

As such, the parties need more time to get all these medical records and bills and to complete any discovery on this current treatment Plaintiff is receiving.

Accordingly, the parties request extending the remaining deadlines by 90 days, as outlined below:

PROPOSED DISCOVERY DEADLINES - LR 26-3(d)

	CURRENT DEADLINE	NEW DEADLINE
Rebuttal Experts	May 19, 2025	August 18, 2025
Discovery Deadline	June 18, 2025	September 16, 2025
Dispositive Motions	July 21, 2025	October 20, 2025
Pre-Trial Order	August 18, 2025	November 17, 2025

If this extension is granted, all remaining discovery mentioned above should be concluded within the stipulated extended deadline.

//

The parties agree that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED: May 21, 2025

QUINN • COVARRUBIAS

By: /s/ Pearl Walker

Stephanie L. Quinn (Nevada Bar No. 12632)
Mariel Covarrubias *pro hac vice*
Pearl M. Walker *pro hac vice*
2220 Douglas Blvd., Suite 240
Roseville, CA 95661
T: (916) 400-2300
F: (916) 400-2311
Email: squinn@quinncova.com
marielc@quinncova.com
pwalker@quinncova.com

Attorneys for Defendants,
JASON HICKMAN; HOLMAN FLEET
LEASING, LLC/ARI FLEET LT; and UNION
PACIFIC RAILROAD COMPANY

DATED: May 21, 2025

MOSS BERG INJURY LAWYERS

By: /s/ Boyd B. Moss

Boyd B. Moss III (Nevada Bar No. 8856)
John C. Funk (Nevada Bar No. 9255)
4101 Meadows Lane Suite, 110
Las Vegas, Nevada 89101
T: (702) 222-4555
F: (702) 222-4556
Email: boyd@mossberglv.com
john@mossberglv.com

Attorneys for Defendants,
THERESA COHEE

IT IS SO ORDERED:

DATED: 5/22/2025


UNITED STATES MAGISTRATE JUDGE

QUINN • COVARRUBIAS

Theresa Cohee v. Holman Fleet Leasing, LLC; et al.

U.S. District Court for the District of Nevada - Case No.: 2:23-cv-01747-JCM-BNW

DECLARATION OF SERVICE

I, Alexis Mendez, declare as follows:

I am employed in the County of Orange, State of California; I am over the age of 18 years and not a party to this action; my business mailing address is 2220 Douglas Blvd., Suite 240, Roseville, California 95661, in said County and State. On May 21, 2025 I served:

STIPULATION AND (PROPOSED) ORDER TO AMEND SCHEDULING ORDER (FIFTH REQUEST)

on the following person(s) at the following address(es), in the manner indicated below:

ATTORNEYS FOR PLAINTIFF:

Boyd B. Moss III, Esq.

John C. Funk, Esq.

MOSS BERG INJURY LAWYERS

5420 W. Sahara Avenue, Suite 101

Las Vegas, NV 89146

T: (702) 222-4555

F: (702) 222-4556

Boyd@mossberglv.com

Tonya@mossberglv.com

John@mossberglv.com

<input checked="" type="checkbox"/>	(BY THE COURT'S CM/ECF SYSTEM): Pursuant to Local Rules, I electronically filed the document(s) with the Clerk of the Court using CM/ECF System, which sent notification to the parties as registered.
-------------------------------------	---

I certify under penalty of perjury that the foregoing is true and correct, and this declaration of service was executed on May 21, 2025, at San Juan Capistrano, California.

By: /s/ Alexis Mendez

Alexis Mendez